

Ehren, In addition to my original comments, I would like to submit the following “comments on the comments”:

- The study should analyze NEM from both Export-Only and All-Output/All-Generation perspectives. Limiting the study to the entire output of NEM systems, as proposed by SDG&E and PG&E, would unfairly prejudice the results of the study.
- T&D Upgrade Costs are Minimal or Non-existent for Interconnecting Solar at the Studied Penetration Levels.

Thank you.

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